



PHONE: 718-301-4593
FAX: 718-247-9391
HTTP://WWW.LONDONINDUSI.COM

JOSEPH INDUSI, ESQ.
PARTNER

CARY LONDON, ESQ.
PARTNER

September 1, 2015

Hon. James Orenstein, U.S. Magistrate
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201
via ECF

Re: Hilaire v. Mims et. al., Docket # 15-cv-748
Letter Motion for Extension of Time to Amend/Join

Your Honor:

I am the attorney for the plaintiff, Ebony Hilaire. I write to request an extension of time to Amend/Join additional parties to October 1, 2015. I have conferred with Mr. Kuruvilla, the attorney for the City and Mr. Kuruvilla consents to this request.

The extension is requested for the following reason: 1) I have not yet received responses to my demands for discovery and interrogatories and wish to have the opportunity to review the paper discovery and interrogatory responses before amending, and 2) the case is still in the early stages and will not cause any unnecessary delay.

Thank you for your consideration in this matter.

Respectfully submitted,

/s/ Joseph Indusi, Esq.
Joseph Indusi, Esq.
Attorney for Ms. Hilaire
London Indusi LLP
186 Joralemon Street, Suite 1202
Brooklyn, NY 11201
(718) 301-4593 – Phone

186 JORALEMON STREET
SUITE 1202
BROOKLYN, NY 11201

111 JOHN STREET
SUITE 640
NEW YORK, NY 10038

330 WILLIS AVENUE
SUITE 1000
ROSLYN HEIGHTS, NY 11577

400 TOWNLINE ROAD
SUITE 170
HAUPPAUGE, NY 11788

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(718) 247-9391 – Fax
Joe@LondonIndusi.com

CC: *Ben Kuruvilla, Esq.*
Attorney for Defendant
Corporation Counsel of the City of New York
100 Church Street, 3rd Floor
New York, NY 10007
Via ECF